

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

06/30/2025

OPDIV:

IHS

Name:

STARS Platform

PIA Unique Identifier:

P-5618668-263352

The subject of this PIA is which of the following?

General Support System (GSS)

Identify the Enterprise Performance Lifecycle Phase of the system.

Operations and Maintenance

Is this a FISMA-Reportable system?

No

Does the system include a Website or online application available to and for the use of the general public?

Yes

Identify the operator.

Agency

Is this a new or existing system?

New

Does the system have Security Authorization (SA)?

No

Indicate the following reason(s) for updating this PIA.**Describe the purpose of the system.**

The Sanitation Tracking and Reporting System (STARS) Platform is a web-based platform developed by the Indian Health Service (IHS) to monitor and manage sanitation-related activities across healthcare facilities serving American Indian and Alaska Native communities. STARS is part of IHS's broader efforts to ensure compliance with sanitation standards and to support public health initiatives.

Describe the type of information the system will collect, maintain (store), or share.

The STARS Platform collects the following Personal Identifiable Information (PII) name, tribe, mailing address, phone numbers, email address, and user credentials. It also collects the following non-PII costs, locations, milestones, Unified Financial Management System (UFMS) summary data.

User Access: IHS employees access the tool via username and password and Personal Identity Verification (PIV). Non-IHS users access the tool via username and password.

Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.

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The information collected is used for the following:

Sanitation Monitoring: STARS enables IHS staff to track sanitation activities, ensuring that facilities meet health and safety standards.

Reporting and Analytics: The system provides tools for reporting and analyzing sanitation data, helping to identify trends and areas for improvement.

Training Resources: STARS includes a training site to support users in effectively utilizing the system.

User Access: IHS employees access the tool via username and password and Personal Identity Verification (PIV). Non-IHS users access the tool via username and password.

Does the system collect, maintain, use or share PII?

Yes

Indicate the type of PII that the system will collect or maintain.

Name

E-Mail Address

Mailing Address

Phone Numbers

User Credential

Indicate the categories of individuals about whom PII is collected, maintained or shared.

Employees

Business Partner/Contacts (Federal/state/local agencies)

Tribal members (home owners)

How many individuals' PII is in the system?

10,000-49,999

For what primary purpose is the PII used?

The primary purpose is to use PII to determine and verify eligibility for sanitation services, justify budgets and project development, track service progress, and link with IHS systems (like RPMS) to support service delivery and eligibility verification.

For users of the system, PII is used to establish user name and password to login to the application

Describe the secondary uses for which the PII will be used.

Testing the application and Training the users.

Identify legal authorities governing information use and disclosure specific to the system and program.

25 USC §1632, 25 USC 3901, 25 USC 450 and 42 USC 2004a

Are records on the system retrieved by one or more PII data elements?

Yes

Identify the number and title of the Privacy Act System of Records Notice (SORN) that is being use to cover the system or identify if a SORN is being developed.

Sanitation Facilities Construction Individual Applicant Records; System Number 09-17-0004

GSA-GOVT-10

Identify the sources of PII in the system.

Directly from an individual about whom the information pertains

In-Person

Government Sources

Identify the OMB information collection approval number and expiration date

Other HHS OIG Data OMB Information Collection Number through Public Law 114-255, the 21st Century Tribal Government Act, Section 2035: Exemption for IHS from the Paperwork Reduction Act

Non-Governmental Sources

Public

Private Sector

Is the PII shared with other organizations?

Yes

Identify with whom the PII is shared or disclosed and for what purpose.

Describe any agreements in place that authorizes the information sharing or disclosure.

Not Applicable

Describe the procedures for accounting for disclosures.

The IHS, with respect to each system of records under its direct control (i.e., Privacy Act System of Record 09-17- 0001, Medical, Health, and Billing Records) must keep a record of the date, nature, and purpose of each disclosure of a record to any person or Agency under subsection (b) of the Privacy Act (5 U.S.C. § 552a) and the name and address of the person or Agency to whom the disclosure is made. This record must be kept for 5 years or the life of the record; whichever is longer, after the disclosure for which the accounting has been made. An individual (beneficiary) is entitled, upon request, to get access to this disclosure record of his or her own personal records with the exception for disclosures made under subsection (b) (7) of the Privacy Act (as a result of civil or criminal law enforcement activity). The IHS must inform any person or other Agency about any correction or notation of dispute made by the IHS in accordance with subsection (d)(4) of the Privacy Act (Access of Records) of any record that has been disclosed to the person or Agency if an accounting of the disclosure was made. This is a mandatory reporting requirement and may be recorded utilizing the IHS-505, "Disclosure Accounting Record" form.

Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason.

Indian Health Manual - Part 2, Chapter 7 - It is IHS policy to provide adequate notice of its uses and disclosures of PHI and of the individual's rights and IHS' legal duties with respect to PHI. A copy of the Notice is provided to new patients, patients whose charts are reactivated, and patients who reach legal age. The Patient Registration Office provides a copy of the current Notice to the patient. The staff member has the patient acknowledge receipt of the Notice by signing the Acknowledgment of Receipt of IHS Notice of Privacy Practices. The signed "Acknowledgement of Receipt of IHS Notice of Privacy Practices" is filed into the patient's medical record.

IHS employees are notified at the time of hire that their PII will be collected and give consent as it is part of the on-boarding process

Is the submission of PII by individuals voluntary or mandatory?

Voluntary

Describe the method for individuals to opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason.

Individuals can choose not to use the application. IHS does not offer an alternative.

Process to notify and obtain consent from individuals whose PII is in the system when major changes occur to the system.

It is IHS policy to provide adequate notice of its uses and disclosures of PHI/PII and of the individual's rights and IHS' legal duties with respect to PHI/PII. The IHS prominently and clearly displays the Notice (2-7.18) in every facility (<http://www.hipaa.ihs.gov/>). A copy of the Notice is also provided to new patients, patients whose charts are reactivated, and patients who reach legal age. The Patient Registration Office or other appropriate department provides a copy of the current Notice to the patient. The patient acknowledges receipt of the Notice by signing the Acknowledgment of Receipt of IHS Notice of Privacy Practices. An IHS staff member signs and dates the Acknowledgement form and files the signed "Acknowledgement of Receipt of IHS Notice of Privacy Practices" into the patient's medical record. No less than every three years, IHS provides notification of the availability of the Notice and how to obtain the Notice. If the Notice is revised by a material change, the revised Notice must be posted in clear and prominent locations in every facility and on its web site, on or after the effective date of the revision. The revised Notice will be posted on the IHS website within the 60 days of a material revision. The revised Notice is also given to all patients who come into a facility after the effective date of the revision and is available upon request on or after the effective date of the revision. Additionally, IHS provides the revised notice to all eligible patients registered in the patient registration system within 60 days of the revision of the Notice. Any individual, whether or not a patient, has the right to request and receive a copy of the Notice at any time, except an inmate. Inmates have no rights to the Notice (45 CFR § 164.520 (a)(3)). IHS employees are notified at the time of hire that their PII will be collected and give consent as it is part of the on-boarding process.

Describe the process in place to resolve an individual's concerns when they believe their PII has been inappropriately obtained, used, or disclosed, or that the PII is inaccurate.

All complaints are addressed to the Service Unit Chief Executive Officer or (his or her) designee for investigation. Complaints are documented, maintained, and filed, and include a brief explanation of resolution, if any. Note: Complaints may also be filed directly with the Secretary, DHHS.

Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy.

System administrators periodically reviews user privileges and roles for accuracy and currency.

Identify who will have access to the PII in the system and the reason why they require access.

Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.

Indian Health Manual, Part 8, Chapter 21 - Access Control

The Information Technology Access Control (ITAC) supervisors are responsible for submitting appropriate access requests for IHS system users on their team and for reviewing their team members' access. The System Administrator then grants the most restrictive access privileges needed to perform job related roles and responsibilities.

Describe the methods in place to allow those with access to PII to only access the minimum amount of information necessary to perform their job.

The system utilizes least privilege and role-based access controls. Access is granted to a limited number of authorized administrators, developers, direct contractors, and federal employees. Standard users do not have access to PII

Identify training and awareness provided to personnel (system owners, managers, operators, contractors and/or program managers) using the system to make them aware of their responsibilities for protecting the information being collected and maintained.

Role-based training, IHS Rules of Behavior agreements, and Information System Security and Privacy Awareness training courses are required to be completed annually by all IHS users.

Describe training system users receive (above and beyond general security and privacy awareness training).

Users are receiving system specific training based on user roles.

Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?

Yes

Describe the process and guidelines in place with regard to the retention and destruction of PII.

Records are stored in a secure facility per IHS Records Disposition Authority (Schedule 3, Section 11, Item No. 11-11a) Then they are transferred to the Federal Records Center (FRC) when administrative value ends, or after 10 years of inactivity, whichever is sooner. Destroy 20 years after retirement to FRC.

Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.

Administrative Controls: Privacy policies (IHS.gov Privacy Policy, HIPAA, Privacy Act) -governing how personal information is handled. Data handling procedures - Ensure administrative oversight in data protection and compliance with regulatory frameworks. User education and transparency.

Technical Controls: Active Directory user access control – Manages who can access what and enforces identity verification. Microsoft BitLocker full disk encryption – Encrypts data at rest to prevent unauthorized access.

Physical Controls: Physical access controls in the Albuquerque Data Center (ADC) – Prevent unauthorized entry to the facility.

Identify the publicly-available URL:

<https://wstars.ihs.gov>

Note: web address is a hyperlink.

Does the website have a posted privacy notice?

Yes

Is the privacy policy available in a machine-readable format?

Yes

Does the website use web measurement and customization technology?

Yes

Select the type of website measurement and customization technologies is in use and if it is used to collect PII.

Does the website have any information or pages directed at children under the age of thirteen?

No

Does the website contain links to non- federal government websites external to HHS?

No

Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?

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